

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of )  
themselves and all others similarly situated, )  
Plaintiffs, ) Civil Action No. 6:21-cv-00474-  
v. ) AA  
U.S. DEPARTMENT OF EDUCATION and )  
Suzanne GOLDBERG, in her official capacity as )  
Acting Assistant Secretary for Civil Rights, )  
U.S. Department of Education, )  
Defendants. )  
**DECLARATION OF LAUREN  
HOEKSTRA**

I, Lauren Hoekstra, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. I reside in Sioux Center, Iowa but my permanent address is in Michigan.
3. I attended Calvin Christian School, a private, Christian high school in Michigan.
4. I am 20 years old.
5. My major is secondary English education with a minor in sociology.
6. Beginning in August, 2018, I became a student at Dordt University (hereinafter “Dordt”) in Sioux Center, Iowa. I am currently a student and expect to graduate in either December 2021 or May 2022.
7. While attending Dordt, I received federal financial aid, including student loans, from the U.S. Department of Education. I have worked a federal work study job at the print and mail center at Dordt my entire time as a student at Dordt.
8. I will have federal student loans that I have to repay as a result of attending Dordt.

9. I attended Dordt because it felt like home. My second-cousins and my friend from home's family went to Dordt. I visited campus during my junior year in high school. The people at Dordt were kind. I liked the religious aspect of the school as it reflected my upbringing in the CRC Church. They had a major that I was interested in at the time. I enjoyed meeting the faculty. In all, it felt like a place that I wanted to be part of.

10. I received quite a few scholarships from Dordt, which also influenced my decision to attend Dordt.

11. Since I can remember, I have always been attracted to females. I started being more aware of what that meant when I was in 8<sup>th</sup> grade. I was in high school when same-sex marriage was legalized in 2015. I remember my mom seeing the news on TV and saying "that is so sad." Her reaction confused me because everyone on the TV looked so happy.

12. I am a queer woman.

13. God created me this way and I am not a mistake.

14. When I decided to attend Dordt, I did not know that Dordt would be hostile to my sexual orientation. I did not find out about Dordt's policies until partway through my first semester.

15. Dordt's student handbook outlines rules of behavior for students.

16. The handbook regulates romantic relationships and sexual conduct. The handbook states "scripture is clear that God created humans as two distinct sexes, male and female; however, due to sin and brokenness, our experience of sex and gender is not always what God the Creator originally designed for His glory and our joy and flourishing as his servants."

17. The handbook later goes on to say “the only appropriate and permissible context in which sexual intimacy may be expressed as overt sexual interaction is in a marriage partnership of a man and a woman.”

18. These statement from the student handbook feel hurtful, patronizing and like they ignore the reality of the sexuality and gender identity of 18-22 year old students. Dordt’s policies on sexuality feel both unfair and oppressive.

19. The 2020-2021 Student Handbook defines the following sexual misconduct forbidden by the handbook as unbiblical:

- A. “Promoting or advocating sexually immoral activity”,
- B. “Extramarital sexual relations”,
- C. “Homosexual relations”,
- D. “Transgendered Behavior.”

20. The 2020-2021 Student Handbook goes on to state the following about same-sex romantic relationships:

*C. Homosexual Relations. It is unacceptable to have sexual relations with someone of the same sex. It is unacceptable to marry or be engaged to marry a person of the same sex. Dordt University also prohibits promoting or advocating such activity.*

*D. Transgendered Behavior. Adopting an identity discordant with one's biological sex is prohibited. Dordt university also prohibits promoting or advocating such activity.*

21. The part about “being engaged to marry a person of the same sex” is new. This change is a result of a female student being engaged to another woman last year. Dordt was unhappy with her engagement and wanted to dismiss her but didn’t have an explicit basis in the student handbook to do so.

22. These policies reflect how queer and trans students are threatened with disciplinary action and expulsion for being who they are and loving who they love. We are held to a different, stricter level than straight students. If you are in a relationship, you have to watch out. Public displays of affection, like holding hands, are not allowed for queer students.

23. Two of my friends were in same-sex dating relationships on campus. They were ratted out by other students and required to meet with administrators. The administrators told them that they shouldn't be in a dating relationship but that if they were going to stay together, they needed to keep it quiet.

24. Homophobia is rampant here at Dordt.

25. I have lost friends because of coming out. Other queer students are too scared to come out because they fear losing friends and respect.

26. The student handbook also says that Dordt may determine that if an individual participates in forbidden conduct “an individual shall be dismissed from the university.” This policy causes queer and trans student to fear that they may be expelled if they are authentic about their identities and relationships.

27. There are no queer role models at Dordt. I wish I had queer role models here because it would make me feel more welcome, safe and accepted.

28. I discussed coming out publicly with members of the administration including the Dean of Student Life, Robert Taylor, and the Dean of Chapel Aaron Baart. I was told that I would not get in trouble for coming out on campus as long as I was not blatantly promoting homosexuality or putting a homosexual relationship “in the face” of the people on campus.

29. I decided at that point to publicly come out in June 2020. The professors who know about my sexuality are supportive, but I only feel safe sharing with the professors who I believe will be understanding and kind about it.

30. I feel a great amount of anxiety relating to my coming out. I am afraid of having professors treat me differently or losing friends. I suffer some depression at school stemming from feeling different from everyone else on campus. I feel repressed in my own identity and feelings.

31. Some professors at Dordt teach in class that those who practice homosexuality will burn in hell. This belief is widespread at Dordt and is reflected in how other students react to me, including one student telling me by direct message that she feared for my soul. Her statement was followed by a long email telling me why being queer is immoral.

32. It would be very helpful for queer and trans students at Dordt if Dordt's nondiscrimination policy included sexual orientation and gender identity. It would also be helpful for queer and trans students at Dordt if they knew that they had Title IX protections.

33. Right now, if queer and trans students suffer discrimination on campus, they are powerless to protect themselves. We would feel safer knowing that if something happened to us, we would be protected and there would be accountability for how we were treated.

34. I am a federal taxpayer and do not feel that my taxes should fund Dordt's discriminatory policies.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 27<sup>th</sup> day of January, 2021.

By:



Lauren Hoekstra